

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE) Chapter 7
)
IDICULLA JACOB,) Case No. 22-9522
)
Debtor.) Hon. A. Benjamin Goldgar

NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE THAT on July 31, 2023, at 9:30 a.m., I shall appear before the Honorable Judge A. Benjamin Goldgar, or any other judge sitting in his stead, either in Courtroom 642, 219 South Dearborn Street, Chicago, Illinois, or electronically as described below and request a hearing on the Chapter 7 Trustee's Application to Employ Accountant, a copy of which is attached hereto and thereby served upon you.

Important: Only parties and their counsel may appear for presentation of the motion electronically using Zoom for Government. All others must appear in person.

To appear by video, use this link: <http://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is Meeting ID: 161 500 0972 and the password is 726993. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, these motions will be called on the presentment date. If no Notice of Objection is timely filed, the Court may grant the motions in advance without a hearing.

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, hereby state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on the 21st day of July, 2023.

s/ Gregory K. Stern

Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380)
Monica C. O'Brien (Atty. ID # 6216626)
Dennis E. Quaid (Atty. ID #02267012)
Rachel S. Sandler (Atty. ID #6310248)
53 West Jackson Boulevard, Suite 1442
Chicago, Illinois 60604
(312) 427-1558

SERVICE LIST

Registrants Served Through The Court's Electronic Notice For Registrants

Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 South Dearborn Street, Room 873
Chicago, Illinois 60604

N. Neville Reid
Fox, Swibel, Levin & Carroll, LLP
200 West Madison Street
Suite 3000
Chicago, Illinois 60606

Marek Loza
2340 S. River Road, Suite 120
Des Plaines, Illinois 60018

Parties Served Via U.S. First Class Mail

KRD, Ltd.
Lois West
35 East Wacker Drive, Suite 690
Chicago, Illinois 60601

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APPLICATION TO EMPLOY ACCOUNTANT

Now comes N. Neville Reid, Chapter 7 Trustee (the “Trustee”), by and through his Attorneys, Gregory K. Stern, Monica C. O’Brien and Rachel S. Sandler, and in support of his Application to Employ KRD, Ltd. and Lois West as Accountants, respectfully states as follows:

1. On August 22, 2022, Idiculla Jacob (the “Debtor”) caused a Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Code (the “Bankruptcy Case”) to be filed; and N. Neville Reid (the “Trustee”) was appointed as trustee in this case.
2. The Trustee’s investigation of assets disclosed a possible fraudulent transfer of real estate between the Debtor and certain family members. On February 2, 2023, an Order Granting Motion to Approve Compromise and Settlement With The Debtor and Related Parties was entered by this Court and, in accordance therewith, \$14,000.00 was paid to the estate. This payment was a taxable event which requires the estate to file a tax return.
3. The Trustee desires to employ the accounting firm of KRD, Ltd. and Louis West (collectively referred to as the “Accountants”). The Trustee has selected the Accountants for the reason that they have experience in matters of this nature and are well qualified to represent the Trustee in this case as to accounting and tax matters.
4. The professional services to be rendered by the Accountants include, but are not limited to: Preparing tax returns, both federal and state; and, Performing accounting services as

necessary for the administration of the estate and as requested of Accountants by the Trustee.

5. The Trustee seeks authorization to employ the Accountants and to compensate them for services rendered in accordance with their standard hourly rates, with all compensation and reimbursement of expenses subject to further approval of this Court.

6. The Accountants represent no interest adverse to the Debtor or to the estate in matters upon which they are to be engaged.

7. To the best of the Trustee's knowledge, the Accountants have no connection with the Debtor, his creditors, or any other party in interest herein, or their respective attorneys, the United States Trustee or any other person employed in the office of the United States Trustee. The affidavit of Lois West attesting to the foregoing is attached hereto and made a part hereof.

8. The retention of the Accountants to perform professional services for the Trustee is in the best interest of this estate.

WHEREFORE, the Trustee prays for an Order, pursuant to 11 U.S.C. § 327(a), authorizing the employment of KRD, Ltd. and Lois West under the terms and conditions as set forth herein and for such other further relief as this Court deems just.

/s/ Gregory K. Stern
Attorney For Chapter 7 Trustee

Gregory K. Stern (Atty. ID #6183380)
Monica C. O'Brien (Atty. ID # 6216626)
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